

**THE BASIL LAW GROUP**

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July 2, 2025

SO ORDERED. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 14.

**By ECF**

Honorable Arun Subramanian  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007



Arun Subramanian, U.S.D.J.  
Date: July 7, 2025

Re: Marvin Vaca v. New York Health & Hospitals Corporation and Diverse Lynx, LLC ;  
Case No. 1:25-cv-04804-AS

Dear Judge Subramanian:

This firm represents defendant New York Health & Hospitals Corporation (along with defendant Diverse Lynx, LLC) in the above-reference case. Defendant New York Health & Hospitals Corporation files this letter-motion respectfully requesting an extension of time, to and including August 1, 2025, to serve an Answer to the Complaint or otherwise move.

Defendant New York Health & Hospitals Corporation was served with the Summons in this action on June 16, 2025. Pursuant to Fed. R. Civ. 12, Defendant is currently required to file its Answer on July 7, 2025.

Defendant has not made any prior requests for an extension of time. The requested extension is necessary to respond to the Complaint.

Plaintiff, through his counsel, Lucas Buzzard, has consented to the proposed extension of time.

The date of the parties next scheduled appearance before the Court is September 9, 2015. The requested extension does not affect any other existing deadlines.

In addition, per the Court's Individual Practices in Civil Cases, New York Health & Hospitals Corporation identifies the undersigned as Lead Trial Counsel.

Thus, Defendant New York Health & Hospitals Corp. moves for an extension of time to Answer the Complaint or otherwise move, to and including August 1, 2025.

Respectfully submitted,

THE BASIL LAW GROUP, P.C.  
*Attorneys for Defendant New York Health &  
Hospitals Corporation*

/s/ David A. Cohen  
David A. Cohen

cc: Via ECF

D. Maimon Kirschenbaum, Esq.  
JOSEPH & KIRSCHENBAUM LLP  
*Attorneys for Plaintiff*